

Exhibit 4

3. Without resorting to hyperbole, I believe that the inclusion of the Unnecessary Allegations in the complaint puts my life and safety at risk for no purpose other than to satisfy plaintiff YEVGENIYA KHATSKEVICH's ("Plaintiff") spiteful intentions.

4. The Complaint (annexed as Exhibit 1 hereto) asserts causes of action against me and certain entities I control for, among other things, sexual harassment. The Complaint contains nothing more than false allegations intended to embarrass me into paying an unwarranted settlement. Plaintiff's malicious and vindictive motives are apparent from her inclusion of the Unnecessary Allegations in the Complaint.

5. I am in the energy business, and as part of my business, I travel extensively both domestically and internationally. As part of my business, I occasionally travel to countries which have strained diplomatic relations with the United States, including Pakistan, North Korea and Ukraine.

6. In the Unnecessary Allegations, Plaintiff alleges that I am working with, or cooperating with, the FBI or CIA. The purported purpose of the Unnecessary Allegations is a meek attempt to excuse Plaintiff's failure to complain about any alleged misconduct during the relevant time. Plaintiff insinuates that my alleged connections to the FBI and CIA intimidated her to such an extent that she never complained about any of the outrageous conduct alleged in the Complaint while she was an intern for one of my companies.

7. As is apparent, Plaintiff's basis for including the Unnecessary Allegations is not credible. Plaintiff could have just as easily alleged that she was intimidated by my supposed relationships with senior governmental officials, without bizarrely alleging that I am secretly working with the FBI or CIA.

8. Plaintiff is aware that I regularly travel to Pakistan, North Korea and Ukraine as part of my business. If these allegations were disclosed in these countries, it would have an immediate and prejudicial effect on my abilities to safely work and travel.

9. Plaintiff maliciously included the allegations that I am secretly working with the FBI or CIA because Plaintiff knows that by doing so, she is placing my life and safety in jeopardy.

10. If these are not stricken from the record, or at least sealed, my safety and my life will be jeopardized when I travel to certain countries.

11. The Unnecessary Allegations are not relevant to any of the claims asserted by Plaintiff, do not concern issues of major public importance, nor am I aware that the Unnecessary Allegations would be of any interest to the public at large.

12. I request the opportunity to address the Court *in camera* with counsel present at the return date of this application.

13. There has been no prior request for the relief requested herein or any other similar relief.

WHEREFORE, I request an order granting my application to strike or seal the Unnecessary Allegations.


ADAM VICTOR

Sworn to before me this
31st day of October, 2014


Notary Public

PATRICIA A. KENNEDY
Notary Public, State of New York
No. 4834294

Qualified in Putnam County
Commission Expires April 30, 2015

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